

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC,
ROBERT ANTHONY URRUTIA, 189 SUNRISE
HWY AUTO LLC, NORTHSHORE MOTOR
LEASING, LLC, BRIAN CHABRIER, *individually and
derivatively as a member of* NORTHSHORE MOTOR
LEASING, LLC, JOSHUA AARONSON, *individually
and derivatively as a member of* 189 SUNRISE HWY
AUTO, LLC, JORY BARON, 1581 HYLAN BLVD
AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591
HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD
AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519
HYLAN BLVD AUTO LLC, 76 FISK STREET
REALTY LLC, 446 ROUTE 23 AUTO LLC and
ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY
THOMASSON, DWIGHT BLANKENSHIP, MARC
MERCKLING, MICHAEL LAURIE, THOMAS
JONES, CPA, CAR BUYERS NYC INC., GOLD
COAST CARS OF SYOSSET LLC, GOLD COAST
CARS OF SUNRISE LLC, GOLD COAST MOTORS
AUTOMOTIVE GROUP LLC, GOLD COAST
MOTORS OF LIC LLC, GOLD COAST MOTORS OF
ROSLYN LLC, GOLD COAST MOTORS OF
SMITHTOWN LLC, UEA PREMIER MOTORS
CORP., DLA CAPITAL PARTNERS INC., JONES,
LITTLE & CO., CPA'S LLP, FLUSHING BANK,
LIBERTAS FUNDING LLC, and JP MORGAN
CHASER BANK, N.A.,

Defendants.
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Case No.: 2:23-cv-6188 (JMW)

**DECLARATION OF
JOHN A. LENTINELLO**

I, **JOHN A. LENTINELLO**, declare under penalty of perjury:

1. I am a partner of Milber Makris Plousadis & Seiden, LLP, attorneys for defendants
Thomas Jones, CPA and Jones, Little & Co., CPA's, LLP (together, "JLC").

2. I submit this Declaration in support of JLC's motion for an Order, pursuant to Fed.
Rs. Civ. P. 12(b)(1), (6) dismissing Plaintiffs' Amended Complaint and all causes of action against

JLC purportedly pleaded therein against JLC, and any other claims or crossclaims that were or could have been brought as against JLC with prejudice.

3. Annexed as **Exhibit “A”** is a true and accurate copy of plaintiffs’ First Amended Complaint (Docket #65).

4. Annexed as **Exhibit “B”** is a true and accurate of JLC’s Notice of Appearance.

5. Annexed as **Exhibit “C”** is a true and accurate copy of JLC’s pre-motion letter seeking permission to move to dismiss pursuant to Fed R. Civ. P. 12(b)(1) and (6).

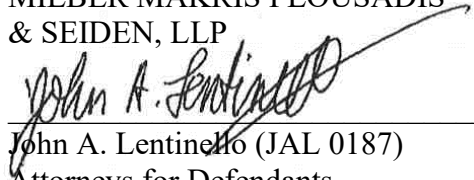
6. Annexed as **Exhibit “D”** is a true and accurate copy of U.S.M.J. James M. Wicks’ Order granting permission for JLC’s instant motion pursuant to Fed. R. Civ. P. 12(b)(1), (6). Thus, JLC’s instant motion is timely filed and filed in accordance with requisite Court permission.

7. Annexed as **Exhibit “E”** is a true and accurate copy of the Declaration of Thomas Jones, CPA of JLC, sworn to on February 6, 2024, with attached exhibits.

8. For the reasons set forth in JLC’s accompanying Memorandum of Law in Support, JLC’s instant motion should be granted in its entirety.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: Woodbury, New York
February 9, 2024

MILBER MAKRIS PLOUSADIS
& SEIDEN, LLP
By: 
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TO: **ALL PARTIES VIA EMAIL**